

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FINTECH INNOVATION ASSOCIATES
LLC,

Plaintiff,

v.

PAYPAL, INC.,

Defendant.

Case No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

FINTECH INNOVATION ASSOCIATES LLC (“FIA” or “Plaintiff”) brings this patent-infringement action against PayPal, Inc. (“PayPal” or “Defendant”).

Parties

1. Plaintiff FIA is a Pennsylvania limited liability company with its principal business address at 121 Lenora LN, Downingtown PA, 19335.
2. Upon information and belief, PayPal is a Delaware corporation, having its principal place of business in San Jose, California and Illinois with Chicago business licenses IDs 2391305 and 2516343¹.

¹ see: <https://data.cityofchicago.org/Community-Economic-Development/Business-Licenses/r5kz-chrr/data>

Jurisdiction and Venue

3. This lawsuit is a civil action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 271, et seq. The Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332, 1338(a), and 1367.

4. This Court has personal jurisdiction over PayPal because PayPal has committed acts giving rise to this action within Illinois and within this judicial district. Defendants regularly do business or solicit business in this District and in Illinois, engage in other persistent courses of conduct and derive substantial revenue from products and services provided in this District and in Illinois, and have purposefully established substantial, systematic, and continuous contacts within this District and should reasonably expect to be sued in a court in this District. For example, PayPal has offices within this district. The website chase.com solicits sales of infringing products to consumers in this District and in Illinois. Given these contacts, the Court's exercise of jurisdiction over PayPal will not offend traditional notions of fair play and substantial justice.

5. Venue in the Northern District of Illinois is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b) because PayPal has regular and established places of business in this District at **222 W Merchandise Mart Plaza STE 800, Chicago, IL 60654**

DOING BUSINESS AS NAME	PayPal, INC	ACTIVITY ID	DATE ISSUED	04/01/2015
ADDRESS	222 W MERCHANDISE MART PLZ 8TH 800	BUSINESS ACTIVITY	LICENSE STATUS	AAI
CITY	CHICAGO	Miscellaneous Commercial Services Financial Services	LICENSE STATUS	
STATE	IL	Commercial Office <u>Computer Design/Development Consulting</u>	CHANGE DATE	
		LICENSE NUMBER	2391305	SSA

Operation Evidence - Chicago business license ID 2516343 "Business Activity" list Computer Design

and has committed acts within this judicial district giving rise to this action for Design Patent infringement, and continues to conduct business originating in this judicial district,

including multiple acts of making, selling, using, and offering for sale infringing products in this District.

The Patent-In-Suit

6. FIA is the exclusive owner of United States Patent No. D945,453 (the “453 patent”) entitled, “Display screen portion with animated graphical user interface” and was duly and legally issued in accordance with 35 U.S. Code § 171 by the U.S. Patent and Trademark Office on March 8, 2022, attached hereto as “Exhibit A”.

7. PayPal has not obtained permission from FIA to use the ornamental design of the ‘453 patent.

8. Attached hereto as “Exhibit B” and incorporated into this complaint as alleged herein a side-by-side claim chart setting forth an ornamental design element comparison of the ‘453 patented design and the accused display screen portion articles made by PayPal. The known accused products used within, and exported from the United States as made, used, sold, and offered for sale by PayPal is the PayPal “Super App” mobile product for iOS² and Android³ and paypal.com⁴. The side-by-side claim chart and evidentiary facts shall support this claim of infringement.

Count I - Infringement of U.S. Patent No. D945,453

9. FIA reasserts and incorporates by reference (Exhibit B, pages 2-5) the preceding paragraphs of this Complaint as fully set forth herein.

² See: <https://apps.apple.com/us/app/paypal-mobile-cash/id283646709>

³ See: https://play.google.com/store/apps/details?id=com.paypal.android.p2pmobile&hl=en_US&gl=US

⁴ See: <https://www.paypal.com/us/digital-wallet/ways-to-pay/pay-with-qr-code>

10. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the PayPal “Super App” animated graphical user interface products, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count II - Infringement of U.S. Patent No. D945,453

11. FIA reasserts and incorporates by reference (Exhibit B, pages 7-10) the preceding paragraphs of this Complaint as fully set forth herein.

12. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the PayPal “Super App” animated graphical user interface products, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count III - Infringement of U.S. Patent No. D945,453

13. FIA reasserts and incorporates by reference (Exhibit B, pages 12-15) the preceding paragraphs of this Complaint as fully set forth herein.

14. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the PayPal “Super App” animated graphical user interface products, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count IV - Infringement of U.S. Patent No. D945,453

15. FIA reasserts and incorporates by reference (Exhibit B, pages 17-20) the preceding paragraphs of this Complaint as fully set forth herein.

16. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count V - Infringement of U.S. Patent No. D945,453

17. FIA reasserts and incorporates by reference (Exhibit B, pages 22-25) the preceding paragraphs of this Complaint as fully set forth herein.

18. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count VI - Infringement of U.S. Patent No. D945,453

19. FIA reasserts and incorporates by reference (Exhibit B, pages 27-30) the preceding paragraphs of this Complaint as fully set forth herein.

20. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which

embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count VII - Infringement of U.S. Patent No. D945,453

21. FIA reasserts and incorporates by reference (Exhibit B, pages 32-35) the preceding paragraphs of this Complaint as fully set forth herein.

22. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count VIII - Infringement of U.S. Patent No. D945,453

23. FIA reasserts and incorporates by reference (Exhibit B, pages 37-40) the preceding paragraphs of this Complaint as fully set forth herein.

24. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count IX - Infringement of U.S. Patent No. D945,453

25. FIA reasserts and incorporates by reference (Exhibit B, pages 42-45) the preceding paragraphs of this Complaint as fully set forth herein.

26. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from

the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count X - Infringement of U.S. Patent No. D945,453

27. FIA reasserts and incorporates by reference (Exhibit B, pages 47-50) the preceding paragraphs of this Complaint as fully set forth herein.

28. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XI - Infringement of U.S. Patent No. D945,453

29. FIA reasserts and incorporates by reference (Exhibit B, pages 52-55) the preceding paragraphs of this Complaint as fully set forth herein.

30. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XII - Infringement of U.S. Patent No. D945,453

31. FIA reasserts and incorporates by reference (Exhibit B, pages 57-60) the preceding paragraphs of this Complaint as fully set forth herein.

32. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XIII - Infringement of U.S. Patent No. D945,453

33. FIA reasserts and incorporates by reference (Exhibit B, pages 62-65) the preceding paragraphs of this Complaint as fully set forth herein.

34. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XIV - Infringement of U.S. Patent No. D945,453

35. FIA reasserts and incorporates by reference (Exhibit B, pages 67-70) the preceding paragraphs of this Complaint as fully set forth herein.

36. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XV - Infringement of U.S. Patent No. D945,453

37. FIA reasserts and incorporates by reference (Exhibit B, pages 72-75) the preceding paragraphs of this Complaint as fully set forth herein.

38. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XVI - Infringement of U.S. Patent No. D945,453

39. FIA reasserts and incorporates by reference (Exhibit B, pages 77-80) the preceding paragraphs of this Complaint as fully set forth herein.

40. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XVII - Infringement of U.S. Patent No. D945,453

41. FIA reasserts and incorporates by reference (Exhibit B, pages 82-85) the preceding paragraphs of this Complaint as fully set forth herein.

42. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which

embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XVIII - Infringement of U.S. Patent No. D945,453

43. FIA reasserts and incorporates by reference (Exhibit B, pages 87-90) the preceding paragraphs of this Complaint as fully set forth herein.

44. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XIX - Infringement of U.S. Patent No. D945,453

45. FIA reasserts and incorporates by reference (Exhibit B, pages 92-95) the preceding paragraphs of this Complaint as fully set forth herein.

46. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XX - Infringement of U.S. Patent No. D945,453

47. FIA reasserts and incorporates by reference (Exhibit B, pages 97-100) the preceding paragraphs of this Complaint as fully set forth herein.

48. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from

the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXI - Infringement of U.S. Patent No. D945,453

49. FIA reasserts and incorporates by reference (Exhibit B, pages 102-105) the preceding paragraphs of this Complaint as fully set forth herein.

50. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXII - Infringement of U.S. Patent No. D945,453

51. FIA reasserts and incorporates by reference (Exhibit B, pages 107-110) the preceding paragraphs of this Complaint as fully set forth herein.

52. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXIII - Infringement of U.S. Patent No. D945,453

53. FIA reasserts and incorporates by reference (Exhibit B, pages 112-115) the preceding paragraphs of this Complaint as fully set forth herein.

54. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXIV - Infringement of U.S. Patent No. D945,453

55. FIA reasserts and incorporates by reference (Exhibit B, pages 117-120) the preceding paragraphs of this Complaint as fully set forth herein.

56. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXV - Infringement of U.S. Patent No. D945,453

57. FIA reasserts and incorporates by reference (Exhibit B, pages 122-125) the preceding paragraphs of this Complaint as fully set forth herein.

58. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXVI - Infringement of U.S. Patent No. D945,453

59. FIA reasserts and incorporates by reference (Exhibit B, pages 127-130) the preceding paragraphs of this Complaint as fully set forth herein.

60. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXVII - Infringement of U.S. Patent No. D945,453

61. FIA reasserts and incorporates by reference (Exhibit B, pages 132-135) the preceding paragraphs of this Complaint as fully set forth herein.

62. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXVII - Infringement of U.S. Patent No. D945,453

63. FIA reasserts and incorporates by reference (Exhibit B, pages 137-140) the preceding paragraphs of this Complaint as fully set forth herein.

64. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XIX - Infringement of U.S. Patent No. D945,453

65. FIA reasserts and incorporates by reference (Exhibit B, pages 142-145) the preceding paragraphs of this Complaint as fully set forth herein.

66. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXX - Infringement of U.S. Patent No. D945,453

67. FIA reasserts and incorporates by reference (Exhibit B, pages 147-150) the preceding paragraphs of this Complaint as fully set forth herein.

68. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXI - Infringement of U.S. Patent No. D945,453

69. FIA reasserts and incorporates by reference (Exhibit B, pages 152-155) the preceding paragraphs of this Complaint as fully set forth herein.

70. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which

embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXII - Infringement of U.S. Patent No. D945,453

71. FIA reasserts and incorporates by reference (Exhibit B, pages 157-160) the preceding paragraphs of this Complaint as fully set forth herein.

72. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXIII - Infringement of U.S. Patent No. D945,453

73. FIA reasserts and incorporates by reference (Exhibit B, pages 162-165) the preceding paragraphs of this Complaint as fully set forth herein.

74. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXIV - Infringement of U.S. Patent No. D945,453

75. FIA reasserts and incorporates by reference (Exhibit B, pages 167-170) the preceding paragraphs of this Complaint as fully set forth herein.

76. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from

the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXV - Infringement of U.S. Patent No. D945,453

77. FIA reasserts and incorporates by reference (Exhibit B, pages 172-175) the preceding paragraphs of this Complaint as fully set forth herein.

78. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXVI - Infringement of U.S. Patent No. D945,453

79. FIA reasserts and incorporates by reference (Exhibit B, pages 177-180) the preceding paragraphs of this Complaint as fully set forth herein.

80. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXVII - Infringement of U.S. Patent No. D945,453

81. FIA reasserts and incorporates by reference (Exhibit B, pages 182-185) the preceding paragraphs of this Complaint as fully set forth herein.

82. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXVIII - Infringement of U.S. Patent No. D945,453

83. FIA reasserts and incorporates by reference (Exhibit B, pages 187-190) the preceding paragraphs of this Complaint as fully set forth herein.

84. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XXXIX - Infringement of U.S. Patent No. D945,453

85. FIA reasserts and incorporates by reference (Exhibit B, pages 192-195) the preceding paragraphs of this Complaint as fully set forth herein.

86. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XL - Infringement of U.S. Patent No. D945,453

87. FIA reasserts and incorporates by reference (Exhibit B, pages 197-200) the preceding paragraphs of this Complaint as fully set forth herein.

88. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLI - Infringement of U.S. Patent No. D945,453

89. FIA reasserts and incorporates by reference (Exhibit B, pages 202-205) the preceding paragraphs of this Complaint as fully set forth herein.

90. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLII - Infringement of U.S. Patent No. D945,453

91. FIA reasserts and incorporates by reference (Exhibit B, pages 207-210) the preceding paragraphs of this Complaint as fully set forth herein.

92. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which

embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLIII - Infringement of U.S. Patent No. D945,453

93. FIA reasserts and incorporates by reference (Exhibit B, pages 212-215) the preceding paragraphs of this Complaint as fully set forth herein.

94. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLIV - Infringement of U.S. Patent No. D945,453

95. FIA reasserts and incorporates by reference (Exhibit B, pages 217-220) the preceding paragraphs of this Complaint as fully set forth herein.

96. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLV - Infringement of U.S. Patent No. D945,453

97. FIA reasserts and incorporates by reference (Exhibit B, pages 222-225) the preceding paragraphs of this Complaint as fully set forth herein.

98. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from

the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLVI - Infringement of U.S. Patent No. D945,453

99. FIA reasserts and incorporates by reference (Exhibit B, pages 227-230) the preceding paragraphs of this Complaint as fully set forth herein.

100. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLVII - Infringement of U.S. Patent No. D945,453

101. FIA reasserts and incorporates by reference (Exhibit B, pages 232-235) the preceding paragraphs of this Complaint as fully set forth herein.

102. PayPal has infringed and continues to infringe the '453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the '453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLVIII - Infringement of U.S. Patent No. D945,453

103. FIA reasserts and incorporates by reference (Exhibit B, pages 237-240) the preceding paragraphs of this Complaint as fully set forth herein.

104. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count XLIX - Infringement of U.S. Patent No. D945,453

105. FIA reasserts and incorporates by reference (Exhibit B, pages 242-245) the preceding paragraphs of this Complaint as fully set forth herein.

106. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count L - Infringement of U.S. Patent No. D945,453

107. FIA reasserts and incorporates by reference (Exhibit B, pages 247-250) the preceding paragraphs of this Complaint as fully set forth herein.

108. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count LI - Infringement of U.S. Patent No. D945,453

109. FIA reasserts and incorporates by reference (Exhibit B, pages 252-255) the preceding paragraphs of this Complaint as fully set forth herein.

110. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count LII - Infringement of U.S. Patent No. D945,453

111. FIA reasserts and incorporates by reference (Exhibit B, pages 257-260) the preceding paragraphs of this Complaint as fully set forth herein.

112. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count LIII - Infringement of U.S. Patent No. D945,453

113. FIA reasserts and incorporates by reference (Exhibit B, pages 262-265) the preceding paragraphs of this Complaint as fully set forth herein.

114. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which

embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count LIV - Infringement of U.S. Patent No. D945,453

115. FIA reasserts and incorporates by reference (Exhibit B, pages 267-270) the preceding paragraphs of this Complaint as fully set forth herein.

116. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Count LV - Infringement of U.S. Patent No. D945,453

117. FIA reasserts and incorporates by reference (Exhibit B, pages 272-275) the preceding paragraphs of this Complaint as fully set forth herein.

118. PayPal has infringed and continues to infringe the ‘453 patent by making, using, distributing, offering to sell and/or selling in the United States and exporting from the United States the paypal.com animated graphical user interface product, which embodies the design covered by the ‘453 patent. PayPal infringing activities violate 35 U.S.C. § 271.

Damages

119. FIA sustains damages as a direct result of PayPal’s infringement of the ‘453 patent.

120. As a consequence of PayPal's present, continued, and future infringement of the '453 patent, FIA is entitled to a damages award for its infringement of the '453 patent on a forward-going basis.

Prayer for Relief

WHEREFORE, FINTECH INNOVATION ASSOCIATES LLC prays for the following relief against PAYPAL INC:

- (a) judgment that PayPal has infringed the Asserted Patent, directly and/or indirectly, literally and/or under the standards of substantial similarity;
- (b) awarding the Plaintiff, the greater damages amount for Defendant's infringement under 35 U.S.C. § 284 or 35 U.S.C. § 289 per asserted count;
- (c) post-judgment injunction relief for all products to discontinue the use, making, selling, and export of products infringing the asserted design counts;
- (d) awarding Plaintiff their costs and expenses incurred in this action;
- (e) awarding Plaintiff prejudgment and post-judgment interest; and
- (f) granting Plaintiff such further relief as the Court deems just and appropriate.

Demand for Jury Trial

FINTECH INNOVATION ASSOCIATES LLC demands a trial by jury on all matters and issues triable by jury.

Date: March 8, 2022

/s/ Matthew Wawrzyn

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